

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES E. SHELTON,

Plaintiff,

v.

FREEDOM FOREVER, LLC,

Defendant.

No. 2:24-cv-04333-GJP

**JOINT STIPULATION TO EXTEND THE TIME FOR  
DEFENDANT TO RESPOND TO PLAINTIFF'S COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, that:

1. The time for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint is extended from September 11, 2024 to, and including, October 2, 2024.
2. The stipulated 21-day extension will not prejudice any party, and is entered in good faith and not for the purposes of delay.
3. No prior extensions have been granted.

*/s/ Jill A. Guldin* */s/ Andrew Roman Perrong, Esq.*  
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Attorneys for Defendant, Freedom Forever, LLC Attorneys for Plaintiff, James E. Shelton

Dated: September 4, 2024

**APPROVED BY THE COURT:**

*/s/ Gerald J. Pappert* *9/5/24*  
Hon. Gerald J. Pappert, U.S.D.J.